

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Criminal Case No. 24-274

vs.

J. Ranjan

DONALD SMITH

MOTION TO SUPPLEMENTARY AMEND CONDITIONS OF RELEASE

That, Donald Smith, Defendant, through his counsel, respectfully files the within Motion and in support thereof avers:

1. That Donald Smith, through his company, Smith and Jamison (SJ), wished to bid on items of supply offered by Defense Logistics Agency (DLA).

2. That DLA would offer these items on the DLA internet Bid Board System (DIBBS) which allowed users like SJ to view requests for proposals, invitations for bids and awards.

3. That SJ did view via DIBBS requests for proposals, then made bids, and received awards on the following eight (8) contracts:

	Award Date	Contract #	Description	Due Date	Total Value
A.	10/30/24	SPE7M224D60BN	200 PG Lubrication Fitting	1/3/25	\$53,600.00
B.	12/6/24	SPE4A625P8485	100 A Screw Caps, Socket Hood	12/31/25	\$8,900.00
C.	12/6/24	SPE4A625P5636	14 pc Bolt Machine	1/19/25	\$2,786.00
D.	12/13/24	SPE7M125P2199	11 ea Hose, Air Duct	1/27/25	\$24,090.00
E.	12/13/24	SPE4A625P8970	159 ea Screw, Machine	2/11/25	\$1,370.58
F.	12/13/24	SPE4A625P9305	194 ea Nut, Plain, Hex	2/6/25	\$919.56
G.	12/17/24	SPE4A625P9413	73 ea Shackle	2/25/25	\$4,296.05
H.	1/29/24	SPE4A624D60EV	20 ea Floodlight Set Electric	2/17/25	\$24,960.00
				TOTAL:	\$120,922.19

4. That prior to fulfilling these awards Donald Smith was indicted in the above-captioned matter on or about 12-18-24 in the United States District Court for the Western District of Pennsylvania.

5. That Donald Smith per his Conditions of Release paragraph 7(t) “is prohibited from engaging in government contracting, either directly or through third parties.” (Please see Exhibit 1 attached hereto and incorporated herein).

6. That this Honorable Court by Court Order did allow ST to fulfill the remaining orders.

7. That ST received the following email on or about March 27, 2025. Please see Exhibit 2 attached hereto and incorporate herein.

8. That Paul DePreist of DLA Aviation Richmond is requesting SJ to fulfill additional parts. (Please see Exhibit attached hereto, and incorporated herein).

9. That Donald Smith respectfully requests this Honorable Court to allow Mr. Donald Smith to fulfill this request and fully remove Conditions of Release paragraph 7(t). (Please see Exhibit 2, supra.).

WHEREFORE, counsel for Mr. Donald Smith respectfully moves this Court to Supplementary Amend the Conditions of Release.

Respectfully submitted,

By: /s/ Michael J. Machen
Michael J. Machen
Attorney for Defendant